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6 Attorneys for Defendant
SALVADOR ORTIZ-PADILLA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.
16

Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea
20 hearing currently scheduled for July 8, 2024, may be continued to July 29, 2024, at 9:00 a.m.

21 The parties have filed a plea agreement in this case and had planned to appear for the
22 change of plea hearing at the scheduled time. However, defense counsel is unable to attend the
23 change of plea hearing for personal health reasons. Defense counsel anticipates that he will be
24 healthy and available for the change of plea hearing on July 29, 2024.

25 The requested continuance is made with the intention of conserving time and resources
26 for both the parties and the Court. The government is in agreement with this request and the
27 requested date is a mutually agreeable date for both parties. The parties stipulate that for the
28 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the

1 date of this order through July 29, 2024, for defense preparation and investigation, pursuant to 18
2 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by resetting
3 the change of plea hearing outweigh the best interest of the public and the defendant in a speedy
4 trial.

5
6 Respectfully submitted,

7 HEATHER E. WILLIAMS
8 Federal Defender

9 Date: July 8, 2024

10 /s/ Reed Grantham
11 REED GRANTHAM
12 Assistant Federal Defender
13 Attorney for Defendant
14 SALVADOR ORTIZ-PADILLA

15
16 PHILLIP A. TALBERT
17 United States Attorney

18 Date: July 8, 2024

19 /s/ Justin Gilio
20 JUSTIN GILIO
21 Assistant United States Attorney
22 Attorney for Plaintiff

23 **ORDER**

24 **IT IS SO ORDERED.** The change of plea hearing currently set for July 8, 2024, is
25 hereby continued to July 29, 2024, at 9:00 a.m.

26 The time through July 29, 2024, is excluded under the Speedy Trial Act pursuant to 18
27 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the
28 continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **July 8, 2024**


UNITED STATES DISTRICT JUDGE